

DISTRICT OF NEW HAMPSHIRE

James Covington, Plaintiff	:	RESPONSE TO MEMORANDUM TO SHOW CAUSE
v.	:	19-CV-384-JD
Veronica Paris, Defendant	:	

I, VERONICA PARIS pro se, the defendant in the above-entitled action, respectfully submits this response to the Plaintiff's MEMORANDUM TO SHOW CAUSE.

I submit this reply memorandum in further support of a summary judgment in favor of Paris and closing of the case for the following reasons:

1. The Plaintiff alleges that he engaged in a five-year sexual relationship with the defendant, Veronica Paris during the 11 pm – 7 am shift in the Health Services Center at the NHSP for Men. He claims that these encounters happened twice weekly over the five years. Chronologically, that is impossible, and his claim has no merit.
 2/2013 – Veronica Paris was hired by NHSP and initially trained on day shift
 2013, 2014, 2015 – Veronica worked overnight shifts with another nurse. Also, during this time, she worked many, many days shifts to cover the lack of total healthcare workers available for shift rotation; often working 12-16 hours per day.
 2016 – James Covington was fired from the Health Services area for making advances on a medical records worker and no longer had access to the Health Services area.
 5/15/2016 – Veronica was injured on the job and did not return to Health Services until 2/2017.
 Covington's claim of sexual abuse is COMPLETELY UNFOUNDED and there has been zero witnesses or evidence to prove such. As explained above, employment and timecard records can easily substantiate the IMPOSSIBILITY of his claims.
2. Health Services is a secure area that requires a correctional officer to let everyone in, and out. James Covington states that rules did not apply to him and he could come & go as he chose. Structurally, that was impossible. Likewise, Prison Security requires that patrol is done through the Health Services area every fifteen minutes. Prison security logs document that processes as well. It is 100% reasonable to expect that if a male inmate is let into a locked area where a woman is working alone, or along side another, they would be completing their required rounds and accounting for everyone for the safety of everyone. Not to mention, the real dangers that encompass an inmate serving a sentence for murdering his girlfriend. Covington's claim of a sexual relationship is COMPLETELY UNFOUNDED and these security logistics add more doubt to any likelihood.
3. On Sunday, July 8, 2018, James Covington approached Lt Keith Forcier to complete an incident report about an interaction with inmate Darryl Bifano and the report stated,

"Covington adamantly denies any inappropriate relationship with Paris." Covington's claim of an inappropriate relationship is COMPLETELY UNFOUNDED and his choice to change his story after the fact leads one to wonder what the real motive is. Clearly, its financial!!!

4. Covington reaches in his statement # 6 that he somehow knows why Paris left employment, or what she was thinking. He was not part of or have any firsthand information regarding the discussions between the NHSP or Paris. You can be assured, that if she was guilty of a crime, the NHSP would be pursuing those charges. Additionally, Paris has since been re-employed in a responsible, medical position and her respected reputation was endorsed by former managers and peers. Her character is NOT the one we should be questioning here.
5. In Statement # 7, Covington states "The burden of proof that the plaintiff wasn't sexually abused by defendant Paris is on her to prove" is completely inaccurate. I, the defendant, is NOT making any allegations, therefore, I have nothing to prove. The plaintiff is accusing me of violating his rights and has not been able to substantiate the claims with any eyewitnesses or concrete, factual evidence. Its 100% circumstantial and all hear se. I repeat, Covington's claims are COMPLETELY UNFOUNDED, and it is disturbing that he has been able to waste the states time and resources with empty accusations.
6. In summary, there is not one eyewitness that can collaborate there was any acts or unduly familiar sexual conduct, the five year employment timeline nullifies any claims that they even worked that closely together over that period of time, the security of the area, as well as the patrol protocol makes it HIGHLY unlikely a 5 year sexual affair would ever go successfully undiscovered and Covington adamantly denied any relationship when asked. It is my belief, that after the situation with Darryl Bifano making a threatening claim against Paris, it was viewed as a perfect opportunity by Covington to make circumstantial claims (Anatomy of a Setup) in hopes to improve his chances for his upcoming parole and secure a nest egg should he get paroled.

Wherefore, I respectfully request that the court grant the Summary Judgement in favor of Paris and close the case, as that would be just and proper.

Sworn to before me this

11th day of May 2021

Stacy Connolly Anagnos

Notary Public

Veronica J Paris

Veronica Paris

Defendant, pro se